

REMARKS

The claims have not been amended. Accordingly, claims 1-17 and 19-43 are currently pending in the application, of which claims 1 and 32 are independent claims.

Applicants appreciate the Examiner's consideration of the patents and articles supplied in the IDS mailed October 30, 2002.

In view of the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

Rejections Under 35 U.S.C. § 102

Claims 1-13, 19-20, 24, 26, and 28-31 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U. S. Patent No. 6,430,538 issued to Bacon, *et al.* ("Bacon"). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 1, as previously presented, recites *inter alia*:

A workflow management system for automating a business process, comprising:

.....

an administrator executable by the computer, wherein the administrator manages automating the business process and comprises an organization manager, a role/group manager, an authority manager, a process manager, and a folder manager;

.....

a form generator executable by the computer, wherein the form generator designs and operates an electronic form related to the business process, and wherein the form generator interfaces with the database, the process designer, the process engine, the web client, and/or the business application program.

Applicants respectfully submit that Bacon fails to teach or suggest at least such features. Applicants further respectfully disagree with the Examiner's response to Applicants' arguments (See Office Action on pages 2-3). The Examiner alleges that Bacon discloses "an administrator

executable by the computer, wherein the administrator manages automating the business process and comprises an organization manager, a role/group manager, an authority manager, a process manager, and a folder manager" (emphasis added). (See Office Action on pages 2-3 and 7-8). To support the rejections and response to Applicants' arguments, the Examiner states that "an administration interface enables a supervisor to manage the system" referring to Bacon at col. 5, lines 13-14 (See Office Action on pages 3 and 7). Applicants respectfully submit that the Examiner fails to properly examine all of the claimed limitations of claim 1.

Bacon discloses an administration interface 140 that allows a person (supervisor) to manage the system as required (See col. 5, lines 13-14). Bacon fails to teach or suggest a computer executable administrator that comprises an organization manager, a role/group manager, an authority manager, a process manager, and/or a folder manager (emphasis added). In other words, the alleged administrator, administration interface 140, **does not have** the aforementioned elements as disclosed in the present invention in claim 1.

Further, Applicants respectfully submit that Bacon fails to teach or suggest at least "a form generator executable by the computer, wherein the form generator designs and operates an electronic form related to the business process". The Examiner states that "the java applet is a form generator" (See Office Action on page 9). The Examiner also states that "the java applet allows for the user of graphic objects, data input cells, and access to the database" (*Id.*) Unlike the Examiner's allegations, Bacon simply discloses a java applet that is included in a HTML page and when a predefined java applet is executed by the server in response to a user selection, the java applet distributes that selected work item to a client (See col. 7, line 10 to col. 8, line 40). Bacon fails to teach or suggest that the java applet designs and operates an electronic form related to the business process. Accordingly, Bacon fails to teach or suggest each and every claimed feature of the present invention as disclosed in claim 1.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(e) rejection of claims 1-13, 19-20, 24, 26, and 28-31. Claims 2-13, 19-20, 24, 26, and 28-31 depend from independent claim 1 and are allowable at least for this reason. Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claim 1, and all the claims that depend therefrom are allowable.

Rejections Under 35 U.S.C. § 103

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the reference or references, when combined, must disclose or suggest all of the claim limitations. The motivation to modify the prior art and the reasonable expectation of success must both be found in the prior art and not based upon a patent applicant's disclosure. See *in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Bacon, et. al. (U.S. Patent No. 6,430,538)

Claims 14, 16-17, 25, and 27

Claims 14, 16, 17, 25 and 27 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Bacon. Applicants respectfully traverse this rejection for at least the following reasons.

As noted above, Bacon fails to teach or suggest each and every claimed feature of the present invention as disclosed in claim 1.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of claims 14, 16, 17, 25, and 27. Claims 14, 16, 17, 25, and 27 depend from claim 1

and are allowable at least for this reason. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claim 1, and all claims that depend therefrom, are allowable.

Claims 32-43

Claims 32-43 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Bacon. Applicants respectfully traverse this rejection for at least the following reasons.

Claim 32, as previously presented, recites *inter alia*:

A method for automating a business process, the method comprising steps of:

.....

modeling the business process, wherein the step of modeling includes generating an organization chart;

.....

executing the business process, wherein the step of executing the business process includes allocating the activity to a participant, and designing and creating an electronic form related to the business process;

.....

Applicants respectfully submit that Bacon fails to teach or suggest at least such features. Bacon fails to teach or suggest both claimed limitations for (1) the step of modeling the business process as disclosed in the present invention, and (2) the sub-step of generating an organization chart. The Examiner acknowledges that Bacon fails to teach the steps of modeling the business process and of generating an organization chart (See Office Action on page 25).

With respect to the step of generating an organization chart, the Examiner states that it is old and well-known in the art to develop an organization chart that maps the relationships between all participating members in the organization; therefore, it would have been obvious to

incorporate this information into the system of Bacon in order to clearly define the responsibilities of each participating member and determine ultimately who is responsible for each activity (See Office Action on page 20). Bacon fails to show the modeling process as recited in claim 32. The cited paragraphs in Bacon simply describe process definitions, which are patentably distinguishable from the modeling process of the present invention. One of the exemplary distinguishable features of the present invention is the organization chart. The Examiner simply alleges that the organization chart is obvious, failing to suggest any reason why one of ordinary skill in the art at the time the invention was made would have combined the teachings presented by the Examiner to teach such a feature. Applicants respectfully submit that the Examiner fails to show in Bacon or provide a secondary reference disclosing the claimed limitation for the step of modeling the business process as disclosed in the present invention.

Further, Bacon fails to teach or suggest the step of executing the business process. The step of executing the business process in claim 32 includes...designing and creating an electronic form related to the business process. As noted above with respect to claim 1, Bacon fails to disclose designing and creating an electronic form related to the business process. Bacon simply discloses a java applet that is included in a HTML page. The predefined java applet in Bacon can neither design nor create an electronic form related to the business process as disclosed in claim 32. The java applet simply distributes a selected work item to a client at the server's request. Accordingly, Applicants respectfully submit that Bacon fails to teach or suggest each and every claimed feature of the present invention as disclosed in claim 32.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 32-43. Claims 33-43 depend from claim 32 and are patentable at least for this reason. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants

respectfully submit that independent claim 32, and all claims that depend therefrom, are allowable.

Bacon, et. al. (U.S. Patent No. 6,430,538) in view of Berg, et. al. (U.S. Patent No. 5,999,911)

Claims 15 and 21-23 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Bacon and further in view of U. S. Patent No. 5,999,911 issued to Berg, *et al.* ("Berg"). Applicants respectfully traverse these rejections for at least the following reasons.

As noted above, Bacon fails to teach or suggest each and every claimed feature of the present invention as disclosed in claim 1.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 15 and 21-23. Claims 15 and 21-23 depend from claim 1 and are allowable at least for this reason. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that claims 15 and 21-23 are allowable.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

/hae-chan park/

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